

June 3, 2011

Federal Election Commission
Attn: Mr. Christopher Whyrick
Reports Analysis Division
Washington, D.C. 20463

RE: Friends of Farr (FEC ID #C00290429)

Dear Mr. Whyrick:

We are in receipt of your letter dated April 29, 2011 regarding the above-referenced committee's amended Post-General Report covering the period 10/14/10-11/22/10. Below are responses to each of the issues raised in your letter.

1. In your letter you state that Schedule A of your report discloses one or more contributions that appear to exceed the limits set forth in the Act.

All contributions in excess of the limits imposed by the Federal Election Campaign Act have been refunded.

On October 14, 2010 a contribution was received from Jason K. Burnett in the amount of \$2,400. This contribution was over the contribution limit by \$179.95 due to a prior nonmonetary contribution from Mr. Burnett received by the committee on October 17, 2009. The committee refunded \$179.95 back to Mr. Burnett on December 1, 2010, during the period covered by the Year End-Report. This refund was not itemized on the Year-End Report because expenditures to this individual were under the \$200 threshold for the election cycle. The committee is filing an amended Year-End Report in order to itemize this refund.

On October 19, 2010 a contribution was received from RINC Diversified-AP in the amount of \$5,000. The contribution was accompanied by correspondence indicating that \$2,400 was to be attributed to Diane Roeder, \$2,400 was to be attributed to Ray Roeder, and \$200 was to be refunded. The committee followed these instructions and reported this information on the Post-General Report. This contribution was still in excess of the permissible limit because RINC Diversified-AP is a partnership that was only permitted to contribute \$2,400 per election, therefore the committee refunded another \$2,400 to RINC Diversified-AP and will reflect this refund on the July 15 Quarterly Report. The committee is also filing an amended Post-General Report that notes this additional refund and attributes the remaining \$2,400 from RINC Diversified-AP as \$1,200 to Ray Roeder and \$1,200 to Diane Roeder.

Your letter requests copies of any refund checks. However, a May 31, 2011 phone conversation with Jill Sugarman, who was available while you were out of the office, confirmed that copies of the refund checks are not required if the refunds are itemized on the amended reports filed in connection with this response. As all refunds have been itemized on amended reports, or will be on a future report, no copies have been mailed to the Federal Elections Commission. If you require copies, please do not hesitate to contact us.

2. Your letter also notes contributions received from an organization that is not a political committee registered with the Federal Elections Commission and questions the permissibility of those funds.

The contributions received from the Carmel Democratic Woman's Luncheon Club are federally permissible funds. The committee received correspondence from the contributor confirming that the funds used to make these contributions comply with the source and amount restrictions of the Federal Election Campaign Act.

Contributions from this organization were reported on line 11(c) of the committee's Post-General Report, which is used
